

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
EASTERN DIVISION**

IN RE:

Dee Ford's West, LLC,

Debtors

§
§
§
§
§

CASE NO: 24-40320
Chapter 11, Subchapter V

TRUSTEE'S OBJECTION TO CONFIRMATION

COMES NOW, Linda B. Gore, Subchapter V Trustee in the above-styled case, and objects to confirmation of the of the Debtors' plan filed in this bankruptcy case for the following reasons:

1. The monthly operating reports need to be filed for each month and must be supported with complete bank statements for each month. For this non-consensual plan, the debtor must offer all its projected disposable income pursuant to 11 U.S.C. §1191(c)(2) and a determination as to whether or not the Debtor is offering all of its disposable income cannot be made without projections and complete information.
2. The debtor's business lease with White Robins Inv. LLC needs assumed.
3. The debtor failed to include the value of the lawsuit in the best interest test analysis so the plan does not comply with 11 U.S.C. § 1129(a)(3) and §1129(a)(7) as incorporated by 11 U.S.C. §1191(a).

WHEREFORE, the Trustee prays that her objection to confirmation will be sustained.

Done this the 19th day of September, 2024.

/s/ Linda B. Gore

LINDA B. GORE, ESQUIRE
SUBCHAPTER V TRUSTEE
P. O. Box 1338
Gadsden, AL 35902
(256) 546-9262
Linda@ch13gadsden.com

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing via email on the party listed below by electronic transmission via the Court's CM/ECF system on Robert J. Landry, III, Esq., Assistant US Bankruptcy Administrator at Robert_Landry@alnb.uscourts.gov, and by electronic transmission via the U.S. Courts CM/ECF system to the debtor's attorneys, Gabe Carpenter at gabe@aclg.law, Megan Carpenter at megan@aclg.law and Harvey Campbell at Buddy@aclg.law on this the 19th day of September, 2024.

/s/ Linda B. Gore _____

LINDA B. GORE, TRUSTEE